

EXHIBIT 11

From: Coleman, Craig S.

Sent: Monday, May 17, 2021 1:00 PM

To: 'Brian Hogan' <bhogan@fkmlaw.com>; Chow, Emily E. <emily.chow@faegredrinker.com>; Duncan, Richard A. <richard.duncan@faegredrinker.com>; Van Oort, Aaron D.

<aaron.vanoort@faegredrinker.com>; Hall, Isaac B. <isaac.hall@faegredrinker.com>; Washburn, Bryan K. <bryan.washburn@faegredrinker.com>

Cc: bfinley@cuneolaw.com; bresch@gustafsongluek.com; 'Michelle Looby'

<mlooby@gustafsongluek.com>; Michael Moskovitz <mmoskovitz@fkmlaw.com>; Rio Pierce

<riop@hbsslaw.com>; jcbourne@locklaw.com; 'Clark, Brian D. (bdclark@locklaw.com)'

<bdclark@locklaw.com>

Subject: RE: In re Pork Antitrust Litigation - Structured Data (Hormel Foods)

Brian –

The Court's Order on Stipulation Regarding Pretrial Scheduling Order (Dkt. 532) establishes a September 1, 2021 deadline for "Substantial Completion of Document and Structured Data Productions." Hormel Foods is continuing to work toward compliance with that deadline. If Hormel Foods is prepared to begin production of structured data prior to September 1, it will do so. Regarding date ranges for available structured data, Hormel Foods expects to be able to produce sales data dating to January 1, 2005. It is continuing to investigate what other data are reasonably accessible and will update Plaintiffs if the information previously communicated changes.

Regards, Craig

Craig S. Coleman

Partner

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From: Brian Hogan <bhogan@fkmlaw.com>

Sent: Friday, May 07, 2021 1:08 PM

To: Chow, Emily E. <emily.chow@faegredrinker.com>; Coleman, Craig S.

<craig.coleman@faegredrinker.com>; Duncan, Richard A. <richard.duncan@faegredrinker.com>; Van Oort, Aaron D. <aaron.vanoort@faegredrinker.com>; Hall, Isaac B. <isaac.hall@faegredrinker.com>; Washburn, Bryan K. <bryan.washburn@faegredrinker.com>

Cc: bfinley@cuneolaw.com; bresch@gustafsongluek.com; 'Michelle Looby'

<mlooby@gustafsongluek.com>; Michael Moskovitz <mmoskovitz@fkmlaw.com>; Rio Pierce

<riop@hbsslaw.com>; jcbourne@locklaw.com; 'Clark, Brian D. (bdclark@locklaw.com)'

<bdclark@locklaw.com>

Subject: RE: In re Pork Antitrust Litigation - Structured Data (Hormel Foods)

This Message originated outside your organization.

Dear Emily and Craig,

Plaintiffs are writing to confirm and summarize the status of the parties' structured data discussions and establish a date by which Hormel Foods will produce its structured data. Plaintiffs request that Hormel Foods commit to producing its structured data by June 15. Plaintiffs are making this request because of the time needed to process and analyze the data in advance of the February 7, 2022 class certification deadline. Please let us know whether Hormel Foods will be able to produce its structured data by June 15.

Regarding the structured data, Hormel Foods advised Plaintiffs that responsive data would be produced from its Oracle Enterprise Data Warehouse, MFGPro/QAD, and AS/400 databases. During the parties' meet and confer, Hormel Foods stated that Oracle and AS/400 have data back to *at least* 2007. It further advised that the current version of MFGPro/QAD has been in use since 2013 but historical purchase order data since 2007 and inventory data since 2010 were preserved and migrated into that database. As set forth in Brian Robison's April 3, 2021 email, Defendants agreed that the structured data start date is January 1, 2005. Accordingly, for each set of data, please let Plaintiffs know whether Hormel Foods will be producing data that covers the relevant time period of January 1, 2005 through December 31, 2020. If not, please tell us what time period the data will cover and, if the data exists, why Hormel Foods will not be producing data for the entire relevant time period.

Best,
Brian

From: Chow, Emily E. <emily.chow@faegredrinker.com>

Sent: Thursday, March 04, 2021 3:52 PM

To: Brian Hogan <bhogan@fkmlaw.com>; Coleman, Craig S. <craig.coleman@faegredrinker.com>;
Duncan, Richard A. <richard.duncan@faegredrinker.com>; Van Oort, Aaron D.

<aaron.vanoort@faegredrinker.com>; Hall, Isaac B. <isaac.hall@faegredrinker.com>; Washburn, Bryan K. <bryan.washburn@faegredrinker.com>

Cc: Chen, Stephanie A. <sachen@locklaw.com>; bfinley@cuneolaw.com; bresch@gustafsongluek.com;
'Michelle Looby' <mlooby@gustafsongluek.com>; Michael Moskovitz <mmoskovitz@fkmlaw.com>

Subject: RE: In re Pork Antitrust Litigation - Structured Data (Hormel Foods)

Dear Brian:

Below please find Hormel Foods' responses to Plaintiffs' structured-data questions, inserted into your original e-mail in [blue font](#).

Best,
Emily

Emily E. Chow

Partner

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From: Brian Hogan [<mailto:bhogan@fkmlaw.com>]

Sent: Friday, February 12, 2021 5:17 PM

To: Coleman, Craig S. <craig.coleman@faegredrinker.com>; Duncan, Richard A. <richard.duncan@faegredrinker.com>; Van Oort, Aaron D. <aaron.vanoort@faegredrinker.com>; Chow, Emily E. <emily.chow@faegredrinker.com>; Hall, Isaac B. <isaac.hall@faegredrinker.com>; Washburn, Bryan K. <bryan.washburn@faegredrinker.com>

Cc: Chen, Stephanie A. <sachen@locklaw.com>; bfinley@cuneolaw.com; bresch@gustafsongluek.com; 'Michelle Looby' <mlooby@gustafsongluek.com>; Michael Moskowitz <mmoskovitz@fkmlaw.com>

Subject: RE: In re Pork Antitrust Litigation - Structured Data (Hormel Foods)

This Message originated outside your organization.

Craig,

Thank you for discussing Hormel Foods' structured data with Plaintiffs and sending the January 15 letter and exhibits. To make sure we understand the exhibit data fields, and therefore, the structured data Hormel Foods will be producing, Plaintiffs have some threshold questions.

Oracle Enterprise Data Warehouse (Exhibit A):

1. **Plaintiffs were unable to identify a field in the data denoting a product grouping or category. This may depict characteristics such as the pork part (e.g., leg or loin) or the level of processing (e.g., breaded or marinated). If such data exists in the sales transaction data, please identify for Plaintiffs. If not, please provide other information that could allow us to map from the 'PRODUCT-SKU' to a product grouping or category.**

Hormel Foods does maintain fields denoting the following product groupings: NAICS code; "Commodity" (i.e., groupings of products like "PK LOINS – BONE IN"); and, for some items, protein-group hierarchy (i.e., species and primal/subprimal). The Company will add those fields.

2. **Plaintiffs have identified the 'SALES_COST' field. Does this field contain cost of goods sold? Please describe which fields Hormel Foods use to calculate its cost of goods sold and the 'SALES_COST' field specifically.**

Hormel Foods confirms that "SALES_COST" refers to the cost of goods sold for the specified product.

3. Are there additional fields in Exhibit A (or Exhibit B) that contain detailed cost of goods sold information? If so, please identify the fields.

The Oracle database does not include additional fields containing details related to costs of goods sold. Data in the MFGPro/QAD database includes all fields used to calculate costs of goods sold, and those fields are included in Exhibit B to our January 15, 2021 letter regarding structured data.

4. What is the 'FIXED_OVERHEAD_COST' field? How is this determined by Hormel Foods? Are there additional fields that comprise FIXED_OVERHEAD_COST?

The "FIXED_OVERHEAD_COST" field was recently added in June 2020 to provide a calculation of each product's contribution margin. It does not apply to historical data.

5. Is the customer sales channel different, in any respect, from "CUST_TYPE" or "CUSTOMER_OUTLET"?

To the extent Plaintiffs are interested in data related to a specific channel (e.g., foodservice, retail, or deli), the item description of a specific product may be the best source. To otherwise respond, Hormel Foods needs more detail from Plaintiffs as to what they are seeking.

6. Is the manufacturing plant name and location different, in any respect, from "PRD_BASLN_ORG_EXT_LOC" or "PRD_BASLN_ORG_EXT_NAME"? If so, are those fields that Hormel will provide?

"PRD_BASLN_ORG_EXT_LOC" and "PRD_BASLN_ORG_EXT_NAME" are not related to the manufacturing plant name or location. Hormel Foods does not maintain database fields for manufacturing plant names or locations, and thus cannot provide such fields. While the Company is able to do recall traceback to determine where a specific product lot was manufactured, it is unable to do so across all products or all lots and notes that some products are manufactured at multiple plants.

7. Is the bill to customer different, in any respect, from 'SOLD_TO_NAME' or 'SOLD_TO_CUSTOMER'? If so, do additional fields exist that Hormel will provide?

"Bill To" and "Sold To" fields are the same thing, and there is no undisclosed related field.

8. Plaintiffs were unable to identify a field in the data denoting the parent customer name. If such data exist in the sales transaction data, please identify for Plaintiffs. If not, would such data be contained in other Hormel Foods data?

The "Bill To" field provides the best information to identify customers of the specified products, but Hormel Foods is working to confirm the availability of additional data fields to denote parent-customer relationships.

9. What is the nature of the table “HCGS_BASE_PRICE”? What information is contained in that table? What price lists does Hormel Foods use? For example, is the price based on a particular series from the USDA?

The “HCGS_BASE_Price” field is an average price, used for establishing guidance to the sales team on trade/promotion activities for certain retail products. It is not calculated by the system or based upon a specific price list across all products.

10. Please describe the “AMOUNT” field from the “HSAS_SA_INVOICE_ITEM” table. Is this a net value or gross value? Does it include other charges (e.g., freight)?

The “AMOUNT” field references net value.

11. Plaintiffs would like to confirm that all returns and other non-sale transactions (credit, debits, rebates, etc.) are also included in these data. If the data are not available, please explain why.

Orders, Invoices, and Sales fields include all sales-related transactions. Hormel Foods confirms that it is producing on-invoice rebate information, marketing payments to customers, and returns. The Oracle Enterprise Data Warehouse database does not track other non-sale transactions that were not specifically on invoice—such as deductions, bill-backs, credits, or debits—and the Company does not have a system for compiling such non-sale transactions on a per-transaction basis.

MFGPro/QAD (Exhibit B):

1. Plaintiffs were unable to identify a field in the data denoting the manufacturing plant name and location. Does such information exist in this data source? What fields would they consist of?

The following fields refer to 3-digit site numbers that reference plant names: “po_site,” “pod_site,” and “tr_site.” Hormel Foods will produce those fields and information sufficient to identify the plant based on the site numbers.

2. What data are contained in the fields “pod_pur_cost” and “pod_std_cost.”

“Pod_pur_cost” refers to purchase cost. “Pod_std_cost” refers to standard cost.

AS/400

Finally, to the extent it is discovered that there are hog-acquisition costs in AS/400, please provide that data and related fields.

Hormel Foods has confirmed that there is data related to hog-acquisition costs in AS/400. We hope to share those fields with Plaintiffs soon.

Thanks for your help.

Regards,
Brian

From: Coleman, Craig S. <craig.coleman@faegredrinker.com>
Sent: Friday, January 15, 2021 3:11 PM
To: Michael Moskovitz <mmoskovitz@fkmlaw.com>; Duncan, Richard A. <richard.duncan@faegredrinker.com>; Van Oort, Aaron D. <aaron.vanoort@faegredrinker.com>; Chow, Emily E. <emily.chow@faegredrinker.com>; Hall, Isaac B. <isaac.hall@faegredrinker.com>; Washburn, Bryan K. <bryan.washburn@faegredrinker.com>
Cc: Brian Hogan <bhogan@fkmlaw.com>; Chen, Stephanie A. <sachen@locklaw.com>; bfinley@cuneolaw.com; bresch@gustafsongluek.com; 'Michelle Looby' <mlooby@gustafsongluek.com>
Subject: RE: In re Pork Antitrust Litigation - Structured Data (Hormel Foods)

Mike –

I've attached a letter following up on our discussions about Hormel Foods' structured data.

Regards, Craig

Craig S. Coleman

Partner

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